

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILLOW INNOVATIONS, INC.,

Plaintiff and Counterclaim Defendant,

v.

CHIARO TECHNOLOGY, LTD.,

Defendant and Counterclaim Plaintiff.

Case No. 2:23-cv-00229-JRG

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Willow Innovations, Inc. and Defendant Chiaro Technology Ltd. d/b/a Elvie (together, “the Parties”) jointly submit this motion and provide notice to the Court pursuant to the Court’s Standing Order Regarding Proper Notification of Settlement. The Parties have reached an agreement in principle to resolve this litigation, including settlement of all matters in controversy between the Parties related thereto. The Parties are now working to finalize and implement the terms of this settlement in principle. The Parties respectfully request a stay of thirty (30) days of all unreached deadlines in the Court’s Docket Control Order, in which time the Parties expect to finalize settlement and file dismissal papers with the Court. A proposed Order is attached.

Respectfully submitted,

By: /s/ Timothy S. Durst

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Respectfully submitted,

By: /s/ Josephine Kim

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Plaintiff Chiaro Technology, Ltd.***

**CERTIFICATE OF CONFERENCE**

Counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and the parties jointly agree to the relief requested in this Motion.

/s/ *Melissa Smith*

Melissa Smith

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. All counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ *Melissa Smith*

Melissa Smith

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